

From: Sarah A. Zylstra
Sent: Monday, August 15, 2022 10:00 PM
To: Ingrisano, Jonathan; Noel Sterett
Cc: Tanner G. Jean-Louis; Wittenwyler, Mike
Subject: RE: Edgewood v. City of Madison [GK-Active.FID3018047]

Jonathon,

I wish we had the luxury of more time. Indeed, if this was arising months ago, I would give you all the time you need to respond. The problem is that we served the discovery and planned the final depositions in this case believing documents would be provided in advance of those depositions. The documents are not just related to Maggie Balistreri-Clarke, which is scheduled for a week from today, but some of the documents relate to Susan VanderSanden, scheduled for this Wednesday. That was partially the need for the rush. (I assume you are not planning on using any new documents with Tim Parks, whose deposition is scheduled for tomorrow.)

In addition, we also sought the documents so that we would get them 4 weeks before the close of discovery in the event that the documents revealed that we needed to depose anyone else. With discovery closing in 3 weeks and our pretrial submissions due a week after that, the week delay (thus far) in providing the responsive documents is prejudicing us.

In any event, you have objected to many of the discovery requests indicating that you are not producing documents at all and claimed privilege on a significant number of Vanderwalle and Wood Communication documents. It does not seem to make sense to wait as we will need to get these issues before the Court so that we can get a ruling on them in advance of the pretrial submissions. Unfortunately, the schedule is not very forgiving at this point in time.

Finally, I do not agree with your comments and characterization on Strange but it is not worth the debate as I will provide you the documents long before Sept. 2.



SARAH A. ZYLSTRA (SHE/HER)
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

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From: Ingrisano, Jonathan <jingrisa@gklaw.com>
Sent: Sunday, August 14, 2022 10:27 PM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>; Noel Sterett <nsterett@daltonmich.com>
Cc: Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Wittenwyler, Mike <mwittenw@gklaw.com>
Subject: RE: Edgewood v. City of Madison [GK-Active.FID3018047]

Sarah:

I received the meet and confer letter at the close of business on Wednesday. I will be responding within a reasonable period of time, and certainly do intend to produce the requested documents related to Maggie Balistreri Clarke in advance of her deposition.

In the meantime, please also be advised that your supplemental production relating to John Strange should be made straightaway, and not delayed until September 2 as your prior communication intimates. This supplementation should have been made long ago, a fact you recognized in our call in July before your vacation. My inclusion of a document request pertaining to John Strange in the interim was prophylactic in nature and should not be an excuse to defer a supplemental production any longer.

Jonathan Ingrisano | Attorney
414.287.9611 direct | jingrisa@gklaw.com

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From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Saturday, August 13, 2022 3:49 PM
To: Ingrisano, Jonathan <jingrisa@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>
Cc: Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>
Subject: FW: Edgewood v. City of Madison

[EXTERNAL] This message originated from outside your domain.

Counsel,

Just following up on this letter, especially given the upcoming depositions. Thank you.



SARAH A. ZYLSTRA (SHE/HER)
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

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From: Sarah A. Zylstra
Sent: Wednesday, August 10, 2022 4:26 PM
To: Ingrisano, Jonathan <jingrisa@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>
Cc: Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>
Subject: Edgewood v. City of Madison

Counsel,

Please see the attached correspondence. Thank you.



SARAH A. ZYLSTRA (SHE/HER)
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
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PO BOX 927
MADISON, WI 53701-0927

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